



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Federal Building  
26 Federal Plaza, 38<sup>th</sup> Floor  
New York, New York 10278

March 19, 2025

**BY ECF & EMAIL**

The Honorable Katherine Polk Failla  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Real Property Located at 1 Central Park West, Unit 32G, New York, New York 10023, 24 Civ. 2420 (KPF)***

Dear Judge Failla:

The Government respectfully writes to seek a two-week extension for the filing of the parties' joint status letter and proposed Civil Case Management Plan and Schedule Order (the "CMP"), which are currently due tomorrow. (ECF No. 33.) The parties have not previously requested an extension of this deadline.

The Government is seeking this extension because it may move to stay this proceeding, pursuant to 18 U.S.C. § 981(g)(1), because civil discovery would adversely affect the ability of the Government to conduct a related criminal investigation. The Government anticipates gaining more clarity as to whether it will seek this stay in the next two weeks. Claimant Ecree does not oppose the request for an extension of the deadline to file the joint status letter and proposed CMP, but reserves the right to oppose the Government's motion for stay, if it chooses to file one.

The parties jointly propose that, if the Government decides not to move for a stay, the parties will file the joint status letter and proposed CMP on April 3, 2025, and Ecree will file its answer, currently due April 3, 2025, two weeks after that. If the Government does move for a stay and the Court denies the motion, the parties will file the joint status letter and proposed CMP within a week of the order denying the stay, and Ecree will file its answer two weeks after the motion is denied. Ecree previously requested an extension of the time to file its answer, which the Court

granted. (ECF No. 35.)

Respectfully submitted,

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By:

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Cc: Jeffrey Alberts & Aaron Wiltse, Esq.

Application GRANTED. The Court will await a further update from the Government on whether it intends to seek a stay. In the event that the Government does not seek a stay, the joint letter and proposed case management plan shall be due on or before **April 3, 2025**, and Claimant's answer shall be due on or before **April 17, 2025**.

The Clerk of Court is directed to terminate the pending motion at docket entry 36.

Dated: March 20, 2025 SO ORDERED.  
New York, New York

Katherine Path Failes

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE